REMARKS

This Application has been carefully reviewed in light of the Office Action dated September 5, 2008. Claims 1-10 are pending and rejected in this Application. Applicants respectfully request reconsideration and favorable action in this case in view of the following remarks.

Claim Objections

Claim 1 is objected to because of informalities. Applicants have amended Claim 1 accordingly. Favorable action is requested.

Section 101 Rejections

The Office Action rejects Claims 1-6 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Office Action further alleges that the claim language "a processor operable to" does not "limit a claim to a particular structure." *See Office Action*, Pages 2-3. The Office Action states that the claim language "configured to" indicates that the functionality would have occurred. *See Office Action*, Page 11. Applicants have amended Claim 1 accordingly. Favorable action is requested.

The Office Action alleges that "[t]he claims represent an abstract idea, directed solely to non-functional descriptive material." *See Office Action*, Pages 2-3. Applicants respectfully traverse these rejections.

Claim 1 discloses a Web Services Directory comprising a computer-readable medium and a processor configured to execute a program of instructions encoded on the computer-readable medium. The program of instructions comprises at least one Business Entity object and at least one User object. The at least one Business Entity object is arranged under the at least one User object. The at least one User object comprises security information defining what objects a user has access to, and the at least one User object grants access to the user based on the security information.

Accordingly, Applicants respectfully contend that Claim 1 does impart functionality. Under M.P.E.P. § 2106.01(I), "[a] claimed computer-readable medium encoded with a computer program is a computer element which defines structural and functional

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interrelationships between the computer program and the rest of the computer which permit the computer program's functionality to be realized, and is thus statutory." Indeed, contrary to the argument at Page 3 of the Office Action that the claim language does not recite any code or steps for causing a computer to do anything, Claim 1 states "a processor, the processor configured to execute a program of instructions encoded on the computer-readable medium." Therefore, Applicants respectfully submit that Claim 1 recites patentable subject matter. Claims 2-6 each depend, directly or indirectly, from Claim 1 and therefore recite patentable subject matter. Thus, Applicants respectfully request that the rejections of Claims 1-6 under 35 U.S.C. § 101 be withdrawn.

Section 102 and 103 Rejections

The Office Action rejects Claims 1-7 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2004/0002955 A1 by Gadbois et al. ("*Gadbois*") in view of U.S. Patent No. 7,296,061 B2 to Martinez et al. ("*Martinez*"). The Office Action rejects Claim 8 under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2004/0204958 by Perkins et al. ("*Perkins*"). The Office Action rejects Claims 9-10 under 35 U.S.C. § 103(a) as being unpatentable over *Perkins* in view of *Gadbois*. Applicants respectfully traverse these rejections for the reasons below.

Claim 8 is directed to a Web Services system that includes a registry in which businesses may register. The registry includes a hierarchical directory including at least one Domain object, at least one User object, and at least one Business Entity object. The at least one Domain object includes a directory prefix name, and the at least one Domain object is a root object of the hierarchical directory. The at least one User object identifies a user account for managing the at least one Business Entity object arranged under the at least one User object. The at least one User object is arranged under the at least one Domain object. The at least one User object comprises security information defining what objects a user has access to in the hierarchical directory, and the at least one User object grants access to the user based on the security information. The at least one Business Entity object includes at least one business name and at least one business contact. The at least one business contact includes at least one business address. The Web Services system includes a storage system for storing business information and is accessible via the hierarchical directory. The cited references do not teach or suggest these limitations.

For example, the cited references fail to teach or suggest an "at least one User object, wherein . . . the at least one User object is arranged under the at least one Domain object, and wherein the at least one User object comprises security information defining what objects a user has access to in the hierarchical directory." The Office Action concedes that *Gadbois* does not teach or suggest "wherein the at least one User object comprises security information defining what objects a user has access to." *See Office Action*, Page 5. Instead, the Office Action contends *Martinez* discloses this limitation. Applicants respectfully disagree. *Martinez* discloses a console application that facilitates creation and management of user accounts. *See Martinez*, Column 7, lines 44-45. Applicants respectfully submit that a console application in no way teaches or suggests a User object in a hierarchical directory that includes security information defining what objects a user has access to in the hierarchical directory. Thus, the console application of *Martinez* does not teach or suggest "at least one User object, wherein . . . the at least one User object is arranged under the at least one Domain object, and wherein the at least one User object comprises security information defining what objects a user has access to in the hierarchical directory." *Perkins* fails to cure this deficiency.

Similar to Claim 8, each of Claims 1 and 7 include limitations generally directed to at least one User object, where the at least one User object is arranged under the at least one Domain object, and where the at least one User object comprises security information defining what objects a user has access to in the hierarchical directory. For at least those reasons discussed above with regard to Claim 8, Applicants respectfully contend that the cited references do not disclose, teach, or suggest the limitations of Claims 1 and 7. For at least these reasons, Applicants respectfully contend that Claims 1, 7, and 8 are patentably distinguishable from the cited references.

Claims 2-6, 9, and 10 each depend, directly or indirectly, from Claims 1 or 8. For at least the reasons above, Applicants respectfully contend that Claims 2-6, 9, and 10 are patentably distinguishable from the cited references.
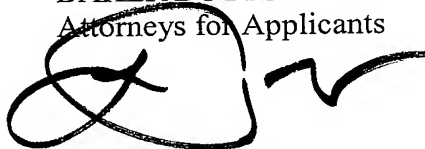
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stand ready to conduct such a conference at the convenience of the Examiner.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fee or credit any overpayment to **Deposit Account No. 02-0384 of Baker Botts L.L.P.**

Respectfully submitted,

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